

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

**IN RE: REALPAGE, INC., RENTAL
SOFTWARE ANTITRUST
LITIGATION (NO. II)**

Case No. 3:23-md-3071
MDL No. 3071

This Document Relates to: ALL CASES

**DECLARATION OF CRIDEN & LOVE, P.A. IN SUPPORT OF
SCOTT & ROBINS LEADERSHIP APPLICATION**

I, Michael E. Criden, pursuant to 28 U.S.C. §1746, declare that the following is true and correct to the best of my knowledge and belief.

1. I am a member in good standing of the bar of the State of Florida and the United States District Courts for the Southern District of Florida.

2. I am a partner of the law firm of Criden & Love, P.A., counsel for Plaintiffs Priscilla Parker, Patrick Parker, Barry Amar-Hoover, Zachary Miller Corradino, and Samantha Taylor Reyes, in the following action that is part of the above-captioned multidistrict litigation (the “MDL”): *Priscilla Parker, et al. v. RealPage, Inc., et al.*, Case No. 1:23-cv-20160.

3. Pursuant to this Court’s April 19, 2023 Order (Dkt. No. 3) and the June 1, 2023 Stipulation and Order (Dkt. No. 119), I submit this declaration in support of the Watters Plaintiffs’ Leadership Application submitted by Scott+Scott Attorneys at Law LLP and Robins Kaplan LLP (the “Scott & Robins Leadership Application”).

4. My firm has been involved in the successful litigation of many complex antitrust cases, including: *Castro v. Sanofi Pasteur Inc.*, 11-cv-7178 (D.N.J.), *Boyd Gaming Corp. v. Visa*, 20-cv-1325 (E.D.N.Y.), and *VistaHealthplan v. Cephalon, Inc.*, 06-cv-1833 (E.D. Pa.).

5. I have been a litigator for over three decades. During that time, either I or Criden & Love, P.A. have been appointed to leadership positions in many different complex cases. *See Leonard Sokolow v. LJM Funds Management, Ltd.*, Case No. 18-CH-11880 (Cook County, Ill.); *Juan Carlos Macias, et al. v. TD Bank, N.A.*, Case No. 16-03420 (D.N.J.); *Jesse Aronstein et al. v. Massachusetts Mutual Life Insurance Co. et al*, Case No. 15-cv-12864 (D. Mass.); and *Vista Healthplan, Inc. v. Cephalon, Inc.*, Case No. 06-cv-01833 (E.D. Pa.) (“Provigil Antitrust Litigation”). Based on this experience and my understanding of the circumstances of this MDL, I support the Scott & Robins Leadership Application.

6. I am familiar with the work of Scott + Scott Attorneys at Law LLP (“Scott+Scott”) and Robins Kaplan LLP (“Robins”). For example, my firm has worked with Scott+Scott in prior cases, including: *In re: Foreign Exchange Benchmark Rates Antitrust Litigation*, 12-cv-07789 (S.D.N.Y.). My firm has also worked with Robins in prior cases, including *In re: Disposable Contact Lens Antitrust Litigation*, 15-md-02626 (M.D. Fla.). Each firm litigated these cases with the utmost professionalism, dedication, and efficiency. They are eminently qualified to lead the Multifamily Plaintiffs in this MDL and I support the appointment of these two firms as interim co-lead counsel, as set forth in the Scott & Robins Leadership Application.

7. I am also familiar with the firms who are seeking appointment to the Plaintiffs’ Steering Committee as part of the Scott & Robins Leadership Application. These law firms are all highly respected based on their substantial experience litigating complex antitrust class actions and achieving outstanding results for their clients and class members. I support the appointment of these firms to positions on the Plaintiffs’ Steering Committee.

8. Finally, I am familiar with Tricia Herzheld, Esq. of Herzfeld, Suetholz, Gastel, Liniski, and Wall, PLLC, and I support the appointment of Ms. Herzheld as Plaintiffs' Liaison Counsel, pursuant to the Scott & Robins Leadership Application.

9. Criden & Love, P.A. is available and willing to assist the Scott & Robins Leadership team should they ask for our assistance in prosecuting this matter.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 5, 2023

Miami, Florida

Michael E. Criden

Michael E. Criden (Jun 5, 2023 11:20 EDT)

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